

From: Regional Forum <regionalroadesaforum@hotmail.com>
Sent: Friday, March 08, 2013 3:54 PM
To: SEPADesk2 (DFW)
Subject: Comment on SEPA No. 13005

Hello,

Below is the comments from the Regional Road Maintenance Forum Permit Committee on the SEPA determination for the Water Crossing Guidelines:

We disagree with WDFW's decision that the WCDG does not have a significant impact on the environment. Existing water crossing structures are part of the environment which includes the built environment [WDFW WAC 220-100-010, WAC 220-100-030 WDFW SEPA and WAC 197-11-444(2)(c)(i) (2) (c) (1)]. The cost and impacts associated with the use of the WCDG have not been evaluated under this SEPA decision. The WCDG has significant costs and impacts upon the 'environment' related to decisions -over design, construction and maintenance of both public and private transportation structures or other infrastructure. These impacts are not identified under question 6 (below) -of the SEPA Checklist. All of the costs associated with the implementation of this proposal should be fully evaluated through the SEPA process [as defined under RCW 43-21c-110(1)(f), WAC 197-11-444, WAC 197-11-740, WAC 197-11-752, WAC 197-11-906 and WAC 220-100-010] before a SEPA decision is issued.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The WCDG address the design of crossings that are owned, built and maintained by others. The use and planning for those roads may be influenced by these guidelines, but ultimately, the owners make decisions depending on their own transportation needs.